

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**PROFESSIONAL FEE MATTERS CONCERNING
THE JACKSON WALKER LAW FIRM**

Case No. 23-00645

**DECLARATION OF LAURA D. STEELE IN SUPPORT OF UNITED STATES
TRUSTEE'S EXPEDITED MOTION TO COMPEL DISCOVERY**

1. I am member of the State Bar of Wisconsin and admitted to practice before the United States Bankruptcy Court for the Southern District of Texas. I am a trial attorney with Office of the United States Trustee ("U.S. Trustee"). I submit this declaration in support of the U.S. Trustee's Expedited Motion to Compel Discovery.

2. On June 4, 2024, the U.S. Trustee served subpoenas for testimony and documents on the Peter Jarvis and Jacqueline Harvey (collectively, "Respondents").

3. On June 18, 2024, the Respondents served the U.S. Trustee with objections to the Respondents' subpoenas. The U.S. Trustee and counsel for the Respondents initially agreed to reserve the week of July 22, 2024, for the depositions of the Respondents if the objections could be resolved.

4. On June 24, 2024, counsel for the U.S. Trustee sent correspondence to Jackson Walker LLP ("Jackson Walker") to determine if Jackson Walker would assert an advice of counsel defense and if it would call the Respondents as witnesses as trial.

5. On July 2, 2024, counsel for the U.S. Trustee conferred with counsel for Jackson Walker via videoconference regarding the disclosure of information held by the Respondents.

6. On July 3, 2024, counsel for Jackson Walker sent correspondence to the U.S. Trustee stating that it does not intend to assert advice of counsel as a defense and does not currently intend to call Mr. Jarvis or Ms. Harvey as witnesses, but otherwise would not remove assertions in its pleadings that put its communications with the Respondents at issue.

7. On July 5, 2024, the U.S. Trustee sent a second letter to Jackson Walker seeking production of a privilege log and copies of its retainer agreements with Holland & Knight LLP.

8. On July 12, 2024, counsel for the U.S. Trustee again conferred via videoconference with counsel to Jackson Walker to discuss the assertion of attorney-client privilege to the Respondents' testimony.

9. On July 23, 2024¹, counsel for the U.S. Trustee conferred via videoconference with counsel to Jackson Walker to discuss a forthcoming privilege log related to Jackson Walker's interactions with Respondents. A privilege log was produced to the U.S. Trustee on July 26, 2024.

10. Additionally, on August 14, 2024, counsel for the U.S. Trustee conferred via videoconference with counsel to Jackson Walker and discussed whether the assertion of attorney client privilege would be withdrawn and documents deemed privilege would be provided. Counsel to Jackson Walker indicated that the assertion of privilege would not be withdrawn and that documents deemed privileged would not be provided. In response, the U.S. Trustee indicated he would then seek relief from the Court.

¹ The Motion to Compel erroneously states that this meeting occurred on July 24, 2024. The meeting occurred on July 23, 2024.

11. In these cases, the parties amicably resolved many issues, but multiple attempts to resolve the remaining issues were unsuccessful.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: August 23, 2024

Respectfully Submitted,

By: _____
Laura D. Steele